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SITE	Peterson Puritan
PHONE	11.9
OTHER	002

Steven J. Ginski
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INTERNATIONAL PLACE I
6400 POPLAR AVENUE
MEMPHIS, TN 38197
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December 1, 2000

Via Certified Mail,
Return Receipt Requested

U.S. Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100, Mail Code: HBO
Boston, Massachusetts 02114-2023

Attn: David J. Newton, RPM
New Hampshire & Rhode Island Superfund Section
Office of Site Remediation and Restoration

**Re: Peterson/Puritan, Inc. Superfund Site
(Operable Unit II - J.M. Mills Landfill)
Cumberland, Rhode Island
Response to Information Request**

Dear Mr. Newton:

After a thorough investigation and search for relevant documents, International Paper Company and its wholly owned subsidiary, Champion International Corporation, (Champion International) have not identified any current or former Champion International facility that may be involved at the J.M. Mills Landfill. On or about August 24, 2000, U.S. EPA Region 1 mailed a letter addressed to the President of Hoerner Waldorf Corporation located at 2250 Wabash Avenue, St. Paul, Minnesota 55114. The company that received the correspondence is known as Waldorf Corporation, a Rock-Tenn Company. A representative of Rock-Tenn Company forwarded EPA's Request for Information to Champion International on or about August 29, 2000.

INTRODUCTION

Champion International was acquired by International Paper in June 2000. On or about July 15, 1985, Champion International sold some of its assets to Waldorf Corporation. It is unknown at this time if any of the assets sold by Champion International to Waldorf are involved in any way at the subject Superfund site. The assets transferred from Champion International to

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Waldorf included a folding carton plant located in Chicopee, Massachusetts. Champion International owned Hoerner Waldorf from 1977 to approximately 1985.

On October 31, 2000, Michelle Lauterback, Esq., of U.S. EPA Region 1 granted International Paper (Champion International) an extension to respond to the subject Information Request so that an investigation could be conducted to determine if Champion International had any nexus to the subject site. On November 29, 2000, Tom Ross, a former Champion International employee, and I spoke to Ms. Lauterback to explain the status of our investigation. She indicated that although our diligent effort did not lead to any information regarding the information request, she requested that we summarize our efforts.

Attached as Exhibit 1, is a document entitled "Attachment 5A." The document was supplied to International Paper by counsel for Waste Management, Roy P. Giarrusso, of the law firm of Giarrusso, Norton, Cooley & McGlone P.C. This document was produced after Ms. Lauterback suggested I contact counsel for Waste Management to determine what information exists that may implicate Champion International or Waldorf Corporation at the subject site. Exhibit 1 contains three entries that we investigated. Each is discussed below.

Champion Builders

Champion Builders did not have a relationship at any time with Champion International. The use of the name "Champion" appears to be a coincidence.

Champion Building Products

Champion International had a retail outlet source that sold building products. The assets of Champion Building Products were sold in 1985 and became known as U.S. Plywood Corporation. U.S. Plywood Corporation was subsequently acquired by Georgia Pacific. Champion International has no information regarding the former Champion Building Products facility that is identified in Exhibit 1. The waste description in Exhibit 1 indicates that the material that may have been generated by the facility was large pieces of sheet rock and plywood. Champion International has no information that either confirms or disagrees with the waste description contained in Exhibit 1.

Hoerner Waldorf

Exhibit 1 indicates that Hoerner Waldorf manufactured cardboard products and that the facility may have been eventually acquired by a company called Stone Container. The 1985 Purchasing Sales Agreement between Champion International and Waldorf Corporation

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identifies a folding carton plant located in Chicopee, Massachusetts that was transferred from Champion International to Waldorf. Chicopee is a significant distance from the J.M. Mills landfill and Ms. Lauterback has indicated the waste disposed at J.M. Mill landfill was generated in Rhode Island and Southern Massachusetts. Chicopee, Massachusetts is located in Western Massachusetts.

Although an extensive document search and investigation has been conducted to determine if Champion International has any involvement at the J.M. Mills landfill, this response does not waive any legal or equitable position Champion International or International Paper may have with respect to the application or interpretation of the Purchase and Sales Agreement dated July 15, 1985, between Champion International Corporation and Waldorf Corporation. Although Waldorf Corporation forwarded the Information Request to Champion International for response, this response does not address the rights and liabilities of Champion International and Waldorf under the Purchase Sales Agreement. Moreover, International Paper and Champion International do not admit that liability at the site, if any, is properly applied to either of them as opposed to Waldorf Corporation or Rock-Tenn.

Lastly, this response to EPA's request does not constitute a waiver of any objections of International Paper or Champion International regarding the Information Request as a whole on the grounds that it is unduly burdensome, unreasonably broad and seeks information that is not reasonably relevant.

CONCLUSION

International Paper has reviewed its records in order to find all documents relevant to EPA's request and consulted with International Paper and Champion International employees to prepare this response. Based on the investigation, International Paper and Champion International believe that they have no CERCLA liability with respect to the site. However, if EPA or any of the potentially responsible parties at the site has additional information which might lead to discovery of information relevant to the site, it is requested that that information be forwarded to me for further review.

Thank you for your consideration. If you have any questions, please contact me.

Very truly yours,



Steven J. Ginski

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SJG:bj

Enclosure

cc: Michelle Lauterback, Esq.
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Peterson/Puritan
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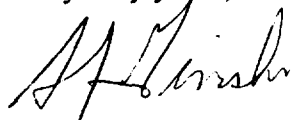
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